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Filing date: **12/29/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91219420
Party	Defendant Goza Tequila, LLC
Correspondence Address	MARK L. SEIGEL THE SEIGEL LAW FIRM LLC 1827 POWERS FERRY RD NE BLDG 6 STE 201 ATLANTA, GA 30339 service@AddIPvalue.com
Submission	Answer
Filer's Name	Mark L. Seigel
Filer's e-mail	seigel@addipvalue.com
Signature	/Mark L. Seigel/
Date	12/29/2014
Attachments	03 - Answer - Goza Tequila.pdf(85137 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

GOYA FOODS, INC.,

Plaintiff,

vs.

GOZA TEQUILA, LLC,

Defendant.

Opposition No. 91219420

Serial No. 86147227

Commissioner for Trademarks
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

ANSWER

Applicant Goza Tequila, LLC (“Defendant”) answers the Notice of Opposition as follows:

- 1) Admitted.
- 2) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.
- 3) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.
- 4) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.

5) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.

6) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.

7) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.

8) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.

9) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.

10) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.

11) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.

12) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.

13) Applicant admits that it intends to distribute and sell tequila. Applicant lacks sufficient information upon which to form a belief as to the remaining allegations of this paragraph, and therefore denies the same.

14) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.

15) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.

16) Applicant lacks sufficient information upon which to form a belief as to the allegations of this paragraph, and therefore denies the same.

I. Likelihood of Confusion

17) Denied.

18) Denied.

19) Denied.

II. Dilution

20) Applicant repeats and re-alleges its responses to paragraphs 1-19 above.

21) Denied.

22) Denied.

23) Denied.

24) Admitted.

WHEREFORE, Defendant requests that Plaintiff's Notice of Opposition be DENIED.

Respectfully submitted on December 29, 2014.

/Mark L. Seigel/

Mark L. Seigel, Esq.

Georgia Bar No. 634617

The Seigel Law Firm LLC

1827 Powers Ferry Rd NE

Bldg 6 Ste 201

Atlanta, GA 30339

770-395-5920

seigel@AddIPvalue.com

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CERTIFICATE OF SERVICE

I hereby certify that on the date below I served a true and correct copy of the foregoing ANSWER on Counsel for Plaintiff by First Class Mail addressed as follows:

Stephen L. Baker, Esq.
Ryan A. McGonigle, Esq.
Baker and Rannells, PA
575 Route 28, Suite 102
Raritan, NJ 08869

/Mark L. Seigel/
Attorney for Defendant

December 29, 2014
Date